EXHIBIT 7

From: Kline Preston Fax: 18666109565 To: Fax: (615) 255-5419 Page: 1 of 6 11/25/2020 4:00 PM

FACSIMILE TRANSMISSION

To:

From: Kline Preston

Kline Preston Law Group

4515 Harding Pike

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TN

37205

Phone: 16152791619

Note:

To: Mr. Joe P. Leniski, Jr., Esq.

From: Lauren Maclean, Paralegal to Mr. Kline Preston, IV, Esq.

RE: Case No. 3:20-cv-00617

Date: 11/25/2020

Pages: 6

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UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

Civil Action No. 3:20-cv-00617	
Class Action	
Jury Trial Demanded	

DEFENDANT, MICHELLE FOREMAN'S, RESPONSE TO PLAINTIFFS' REQUESTS FOR ADMISSIONS

Comes the Defendant, Michelle Foreman, by and through counsel, and hereby answers the Plaintiffs' Requests for Admissions:

 Admit that You and/or No Tax 4 Nash caused pre-recorded messages to be sent to Plaintiffs' cellular telephone.

RESPONSE: DENIED.

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 Admit that You and/or No Tax 4 Nash caused pre-recorded messages to be sent to Plaintiffs' cellular telephone through an auto-dialer.

RESPONSE: DENIED.

 Admit that You and/or No Tax 4 Nash caused the pre-recorded messages to be sent to at least 100 individual cellular telephone numbers.

RESPONSE: DENIED.

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> 4. Admit that the pre-recorded messages You and/or No Tax 4 Nash caused to be sent to cellular telephone numbers was a political advertisement on behalf of No Tax 4 Nash.

RESPONSE: DENIED.

5. Admit that You and/or No Tax 4 Nash obtained cellular telephone numbers for the purpose of sending pre-recorded messages as a promotional tactic to generate interest in No Tax 4 Nash's causes.

RESPONSE: DENIED.

6. Admit that You and/or No Tax 4 Nash possess documents which identify the individuals to whom Defendant sent pre-recorded messages.

RESPONSE: DENIED.

7. Admit that You and/or No Tax 4 Nash supplied a list of cellular telephone numbers to the auto-dialer for the purpose of sending pre-recorded messages.

RESPONSE: DENIED.

8. Admit that You and/or No Tax 4 Nash determined which cellular telephone numbers to include on the list of cellular telephone numbers supplied to the auto-dialer.

RESPONSE: DENIED.

9. Admit that You and/or No Tax 4 Nash knew the auto-dialer would be sending prerecorded messages to the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

10. Admit that You and/or No Tax 4 Nash knew that the auto-dialer would store in its possession the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

11. Admit that You and/or No Tax 4 Nash are responsible for the content of the pre-recorded messages that the auto-dialer sent to the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

12. Admit that You and/or No Tax 4 Nash controlled the content of the pre-recorded messages that the auto-dialer sent to the list of cellular telephone numbers.

RESPONSE: DENIED.

13. Admit that You and/or No Tax 4 Nash created the pre-recorded messages, including the substance of the recording, for pre-recorded messages that auto-dialer sent to the list of cellular telephone numbers.

RESPONSE: DENIED.

14. Admit that You and/or No Tax 4 Nash do not possess any document wherein Plaintiffs directly requested to receive pre-recorded messages to their cellular telephones concerning No Tax 4 Nash.

RESPONSE: ADMITTED.

15. Admit that You and/or No Tax 4 Nash did not receive verbal permission from Plaintiffs to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

16. Admit that You and/or No Tax 4 Nash did not ask verbal permission of Plaintiffs to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

17. Admit that Plaintiffs have never directly given You and/or No Tax 4 Nash a written statement on each of their behalf giving You and/or No Tax 4 Nash permission to send pre-recorded messages to their cellular telephones.

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RESPONSE: ADMITTED.

18. Admit that You and/or No Tax 4 Nash did not ask Plaintiffs for a written statement

giving permission to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

19. Admit that You and/or No Tax 4 Nash are not in possession of any document in which

Plaintiffs specifically identify You and/or No Tax 4 Nash as having permission to send

pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

20. Admit that You and/or No Tax 4 Nash are not aware of the existence of any document in

which Plaintiffs specifically identify You and/or No Tax 4 Nash as having permission to

send them pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

21. Admit that You and/or No Tax 4 Nash have never had any direct communications with

Plaintiffs.

RESPONSE: ADMITTED.

Respectfully submitted,

KLINE PRESTON LAW GROUP

/s/ G. Kline Preston, IV, Esq. G. Kline Preston, IV, Esq (#017141)

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Attorney for Defendant, Michelle Foreman

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via CM/ECF on the 25th day of November 2020 to the following:

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> /s/ G. Kline Preston, IV, Esq. G. Kline Preston, IV, Esq.